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In the Matter of:	<b>UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY</b>
ERNESTO L. ARANA AND MEGAN L YOUNG	Chapter 13
Debtors	Case No. 17-19726 (JKS)
	Hearing Date: 2/27/2018
	Honorable: John K. Sherwood

**CERTIFICATION IN OPPOSITION TO MOTION TO FOR RELIEF FROM STAY**

Ernesto Arana, of full age hereby certifies and says:

1. I am a Co-Debtor in the above captioned Chapter 11 case and as such I am fully familiar with the facts contained herein. I make this certification in opposition to the Motion for Relief from Automatic Stay (the "Stay Motion") of FIG Capital Investments NJ13 LLC ("FIG Capital") filed with this Court on February 1, 2018 that is scheduled to be heard on February 27, 2018.

2. The certification of Mark Gonzalez filed in support of the Stay Motion alleges that FIG Capital obtained a tax sale certificate with respect to my primary residence located at 18 Burroughs Way, Maplewood, NJ on October 3, 2016 and that the amount due and owing as of January 26, 2018 is \$50,682.34.

3. While I was aware that FIG Capital had purchased the tax sale certificate at a tax sale conducted by the Township of Maplewood, the Certificate of Sale, which is the only document that I had ever received on the subject that is annexed to Mark Gonzalez's certification as Exhibit "A" provides that the Total Cost of Sale is \$5,329.32. Accordingly FIG Capital was listed in Schedule D of my petition as a secured creditor with a claim of \$5,329.32.

4. FIG Capital did not file a proof of claim in this matter until January 25, 2018, more than eight (8) months after our voluntary petition was originally filed. The proof of claim filed under Claim No. 10-1 was in the amount of \$126,662.83, which claim was voluntarily withdrawn by FIG Capital on January 30, 2018. A revised proof of claim has yet to be filed.

5. Instead, FIG Capital elected to file this Stay Motion two days after withdrawing its proof of claim. Exhibit "B" of Mark Gonzalez's certification appears to indicate that the previously stated claim of \$126,682.34 has been reduced by the sum of \$76,000.00, resulting in the present asserted claim of \$50,682.34 without further explanation.

6. Contrary to what is stated in Mr. Gonzalez's certification it was my understanding that the primary mortgagee on my residence, Selene Finance, LP ("Selene") was paying real estate taxes post-petition pending review of the Loan Modification Application ("LMA") that I filed with the mortgagee. I am in the process of attempting to confirm the foregoing with Selene and the Maplewood Township Tax Collector. If that is not the case I will pay the first quarter taxes due next week.

7. For all of the foregoing reasons I am respectfully requesting that this Court deny FIG Capital's Stay Motion.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the statements made by me are willfully false, I am subject to punishment.

Dated: February 20, 2018

/s/ Ernesto L. Arana

Ernesto L. Arana

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